

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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| IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION | MDL No. 2875 HON. ROBERT B. KUGLER |
| THIS DOCUMENT RELATES TO ALL CASES | |

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Jessica M. Heinz, Esq,**
CIPRIANI & WERNER, P.C.
450 Sentry Parkway, Suite 200
Blue Bell, Pennsylvania 19422
Attorneys for Defendants Aurobindo Pharma, Ltd., Aurobindo Pharma USA, Inc., and
Aurolife Pharma, LLC (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Blessy Johns, Director - Regulatory Affairs, on April 15 and 16, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Cipriani & Werner, P.C., 450 Sentry Parkway, Suite 200, Blue Bell, Pennsylvania 19422, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 23, 2021

BURSOR & FISHER, P.A.

By: /s/ Andrew J. Obergfell
Andrew J. Obergfell

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EXHIBIT A

30(B)(6) TOPICS

Communications with Regulatory Agencies

29. The communications with any regulatory authority, including but not limited to the FDA, with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for Aurobindo's valsartan API.
30. Aurobindo's communications with regulatory authorities, including the FDA, with regard to the actual or potential contamination of Aurobindo's valsartan API with nitrosamines including NDMA and NDEA.
31. Aurobindo's communications with regulatory authorities, including the FDA, with regard to the actual or potential contamination of Aurobindo's valsartan finished dose with nitrosamines including NDMA and NDEA.
32. Aurobindo's filings with regulatory authorities, including the FDA, regarding manufacturing process changes for Aurobindo's Valsartan API Drug Master Filings.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Blessy Johns.
2. The complete production of Blessy Johns' relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

BURSOR & FISHER, P.A.

By: /s/ Andrew J. Obergfell
Andrew J. Obergfell

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